



**HELEN F. DALTON & ASSOCIATES, P.C.  
ATTORNEYS AT LAW**

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80-02 Kew Gardens Road, Suite 601, Kew Gardens, NY 11415  
Tel. (718) 263-9591 Fax. (718) 263-9598

December 1, 2020

**Via ECF**

The Honorable Judge Vera M. Scanlon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: **Cabrera, et al. v. Amendola Marble & Stone Center, Inc., et al.**  
**Docket No. 19-CV-6530 (RRM)(VMS)**

Dear Judge Scanlon:

Our office represents the Plaintiffs in the above-referenced matter and we submit this letter to provide the Court with revised allocations of the settlement proceeds as discussed during the parties' November 30, 2020 Fairness Hearing.

As discussed during the Fairness Hearing, Plaintiffs' counsel has removed the costs of service on the non-answering Defendants, "ABC Corporation" d/b/a Stone Logic, Ruben Sinchi and Victor Bautista. As such, Plaintiffs' counsel's costs of service have been reduced from \$715.00 to \$345.00. Further, the total amount of reimbursed expenses has been reduced from \$1,123.00 to \$753.00.

In light of this reduction, Plaintiffs' counsel respectfully requests \$3,082.00 in attorneys' fees and \$753.00 in expenses, totaling \$3,835.00.

**Settlement Amount:** \$10,000.00

**Attorneys' Expenses:** \$753.00

**Settlement less Expenses:** \$9,247.00

**Requested Attorneys' Fees:** \$3,082.00 (\$9,247.00 / 3)

**Total payable to Attorneys:** \$3,835.00 (\$3,082.00 + \$753.00)

**Total payable to Plaintiffs:** \$6,164.00

As such, the allocations in Paragraph 1(a) of the Settlement Agreement [Dkt. No. 32, Ex. 1] will be adjusted as follows:

- i. Pedro Cabrera: increased from \$2,500.00 to **\$2,600.00**
- ii. Jesus Chale: increased from \$2,000.00 to **\$2,090.00**
- iii. Edison Bermeo Berrones: increased from \$1,418.00 to **\$1,475.00**
- iv. Helen F. Dalton & Associates, P.C.: reduced from \$4,082.00 to **\$3,835.00**

We thank Your Honor for her consideration on this matter and remain available to provide any additional information.

Respectfully,

  
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James O'Donnell, Esq.